

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS MITCHUM
TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE
(OCA/USPS-T40-88-89)

The United States Postal Service hereby provides the responses of witness Mitchum to the above-listed interrogatories of the Office of the Consumer Advocate, filed on July 21, 2006.

Each interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

David H. Rubin
Attorney

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2986; Fax -6187
August 4, 2006

RESPONSE OF POSTAL SERVICE WITNESS MITCHUM
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-T40-88. This interrogatory seeks information on Confirm service revenues. Please refer to your response to OCA/USPS-T40-43(d), which calculates the average price per scan of \$0.000061. Please confirm that your calculation of the average price per scan of \$0.000061 is based on only revenue on blocks of units and does not include revenue for fees. If you do not confirm, please explain, show all calculations, and provide citations to all sources used.

RESPONSE:

Confirmed.

RESPONSE OF POSTAL SERVICE WITNESS MITCHUM
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-T40-89. This interrogatory seeks information on the pricing of Confirm service. Please refer to your response to OCA/USPS-T40-32(e), where it states, “the existence of these different features shows that it is not unreasonable to treat the classes differently with respect to their ancillary services.” Also, refer to your response to OCA/USPS-T40-31(d). Please confirm that, with the exception of repositionable notes, the special services cited *are not priced differently* where those special services are available for use with two or more classes of mail. If you do not confirm, please explain.

RESPONSE:

Not confirmed. Delivery Confirmation is also priced differentially, based on the class of mail by which the host piece is shipped. Additionally, the inability to combine many special services with Standard Mail could be viewed as each special service having a different “price,” in that to avail oneself of some of the special services, the sender must purchase a different underlying class of mail. Certainly, the underlying classes have different prices themselves. The unavailability of some special services with Standard Mail is consistent with the notion that First-Class Mail and Standard Mail are indeed different, and have different features.